

UNITED STATES OF AMERICA )  
 )  
 Plaintiff, )  
 )  
 v. ) No. 4:20-CR-174 SEP/NAB(SRW)  
 )  
 DELEO BARNER )  
 )  
 Defendant. )

Mr. DeLeo Barner, through counsel, respectfully requests a one-time modification of his bond conditions to allow him to travel with his sister to his family's July 4<sup>th</sup> weekend celebration in Springfield, IL in the Central District of Illinois. In support of this motion, he states the following:

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6. Mr. Barner has not incurred a single violation report during his nearly ten months on bond, and he has made the most of his time on Curfew by obtaining well-paying employment;
7. Mr. Barner has even been permitted to travel for work purposes to the Western District of Missouri and the Southern District of Illinois since a modification was granted almost two months ago (Doc # 40) and has incurred no violations since that change was made;
8. Mr. Barner's family is gathering over the July 4<sup>th</sup> holiday weekend at family members' homes in Springfield, IL;
9. Mr. Barner is respectfully requesting the Court's permission to leave St. Louis by car with his sister Shirley McPherson on July 2, 2022. They intend to visit Springfield, IL and stay with family members Calvin Carter at 1808 E. Melrose, Springfield, IL and Darla Twitty at 1546 East Mason, Springfield, IL. They plan to drive back on the evening of Monday July 4, 2022. Ms. McPherson is the sister he has been living with during his time on bond in this case;
10. Mr. Barner also requests that he be relieved of his curfew during this travel to allow him the flexibility to travel freely with his sister while they are in Springfield;

Wherefore Mr. Deleo Barner respectfully requests this Court to modify his bond conditions to allow him to travel with his sister to his family's July 4<sup>th</sup> gathering in Springfield, IL.

Respectfully submitted,

/s/Melissa K. Goymerac

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ATTORNEY FOR DEFENDANT

**CERTIFICATE OF SERVICE**

I hereby certify that on June 16, 2022, the foregoing was filed electronically with the Clerk of the Court to be served by operation of the Court's electronic filing system upon the United States Attorney.

/s/Melissa K. Goymerac

MELISSA K. GOYMERAC

Assistant Federal Public Defender